EPA Brownfields Grant

ASSESSMENT WORK PLAN

FOR

Project: Old Bremerton Gas Plant Park & Property Development

Final 06/30/06

Site: Old Bremerton Gasworks and Sesko Properties

EPA Project Number 560-F-06-201

Submitted by

City of Bremerton

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1.0 Introduction

1.1 Project Description

The site, located at 1725 Pennsylvania Ave., Bremerton, WA, consists of three legal parcels bounded by Thompson Drive to the west, Pennsylvania Avenue and residential properties to the east, the Port Washington Narrows waterway to the north, and another property parcel to the south. For the purpose of this document, the parcels are described as the McConkey (middle and north) and Sesko parcels. See **ATTACHMENT A**.

This site and adjacent properties currently are used for light industrial purposes and storage of various materials, including boat parts and metal debris. Historic uses include a coal gasification plant, petroleum bulk storage and distribution plant, concrete manufacturing plant, sheet metal fabricator, drum storage facilities, boat/vehicle repair facilities, sandblasting, painting, electroplating operations, and salvage yard.

Conditions of known or potential environmental concerns are based on historical operations. An abandoned underground fuel pipeline that once connected an adjacent petroleum bulk plant to a former fuel dock reportedly leaked at one time though no details were provided. Residue deposits and dark stained areas have been observed in historical aerial photographs as noted in the Phase 1 Environmental Site Assessment (ESA) from 1997. The Washington State Department of Ecology (DOE) became involved in the 1990s in response to reports of oil seeps on the Sesko parcel and Port Washington Narrows shoreline. The DOE conducted multiple visits and the site is included on the Confirmed and Suspected Contaminated Sites List (CSCSL).

The properties likely became contaminated through the leaks, spills, and discharges from fuel storage and operations conducted on site. Releases likely occurred in the 1920s-1980s. The Site plan in **ATTACHMENT B** shows the property locations and land overlay from the Phase 1 ESA by Environmental Associates in 1997 and **ATTACHMENT C** shows proposed exploration locations to evaluate the potential for contaminated soil and possible groundwater impacts by GeoEngineers for the McConkey/Sesko properties in 2005. The adjacent property, to the east, formerly used as a petroleum bulk plant, is included in the state's "Confirmed or Suspected Contaminated Site's List" (CSCSL) based on confirmed petroleum related soil and groundwater contamination identified. Existence of migrating petroleum is possible.

Contaminants known or potentially present include petroleum hydrocarbons, tributyl-tin, metals volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs, including polycyclic aromatic hydrocarbons [PAHs]), polychlorinated biphenyl's (PCBs) and byproducts associated with manufactured gas plants. Information pertaining to groundwater, surface water, oil seep, or subsurface soil conditions at the site has not been identified. Only two soil samples and one sediment sample have been obtained previously and tested for SVOCs. PAHs were found at concentrations exceeding state cleanup levels.

The *City of Bremerton* (the City) will facilitate the revitalization of this community in cooperation with their partners and interested parties. Because of the complexity of the site characterization needed and the long industrial site history, it is anticipated that assessment costs could exceed $500,000. Therefore, in addition to the $200,000 funding provided through this grant, the City will need to seek alternate funding sources, including the EPA *Targeted Brownfields Assessment* program, and Washington State Department of Ecology to complete the analyses required to completely assess this site and obtain state concurrence.

The ***Old Bremerton Gas Plant Park & Property Development*** project will transform an austere section of Bremerton waterfront while providing increased availability and accessibility of public amenities and jobs to very low, low-moderate-income residents. The development of marine-related businesses and light industrial facilities (**see ATTACHMENT D,** outlining a proposed redevelopment plan) will stimulate economic development within this entire community that will result in a healthy commercial tax base and ease the burden on local taxpayers.

1.2 Organizational Structure and Responsibilities

The City staff, in conjunction with EPA's Office of Brownfields Cleanup and Development, would administer the grant. The City will coordinate assessment activities with the Washington State Department of Ecology (DOE) for regulatory oversight. Site assessment activities will be sub-contracted to their environmental contractors, GeoEngineers, working with DOE's Voluntary Clean-up Program (VCP) consistent with 40 CFR Part 30. The City will also provide payment to DOE through direct invoices received from the state agency.

The organizational structure includes a Mayor and Council, Public Works Director (Phil Williams), and designated project manager(s) within the department. For this project, the department's project manager, Dan Miller, will provide project management. The organizational chart follows normal internal operations within the agency.

GeoEngineers, the City's environmental contractor, has been selected consistent with 40 CFR Part 30 for this project. GeoEngineers has prepared a conceptual remedial investigation plan for the site and will oversee site assessment activities while working within DOE's Voluntary Cleanup Program (VCP) framework. As a result, GeoEngineers will provide technical oversight and will report directly to the City's designated Public Works project manager as well as the DOE. Additionally, the GeoEngineers team will include Art Anderson Associates who will provide local stakeholder and community involvement support for this portion of the project. All administrative duties will fall under the Finance Director and other finance staff at the City who has expertise in managing the grants that the City receives including all federal, state, and local grants. Some elements of the work plan will be carried out by the City's contractor, GeoEngineers, for preparing plans and will report to the City's Public Works Director and project manager as well as support organizations.

The City, local businesses, and property owners have an established working relationship at these sites. The City will likely enter into a Voluntary Cleanup Program (VCP) Agreement with the Washington State Department of Ecology and request regulatory oversight for cleanup planning.

2.0 PROJECT TASK DESCRIPTIONS

Task 1- PROJECT MANAGEMENT AND REPORTING

The City will perform project management as required to implement and manage this project under the cooperative agreement, including all required reporting and contractor procurement. EPA grant funds in the amount of **$16,500** are budgeted to perform the following sub-tasks:
A) Project Management: Using grant funds the City's recipient staff will perform those activities necessary to manage the project in accordance with the work plan and all required statutes, circulars, terms & conditions, including establishment and maintenance of requisite cooperative agreement records and files; financial management, project oversight, travel and attendance at EPA-sponsored workshops, and necessary project or public meetings. **Milestones:** maintenance of agreement records and files quarterly, financial and contractor oversight until closeout, and attendance at all project meetings (at least quarterly).

Measures of Success: Effective administration and management of this project and maintenance of all project records. **Deliverables:** Submittal of EPA - Quarterly Reports and MBE/WBE Reports and maintenance/storage of all project records.

B) Periodic Reporting: Using grant funds the City's recipient staff will prepare and submit project progress, financial and MBE/WBE reports. **Milestones:** Quarterly Progress Reports within 30 days of the end of each federal fiscal quarter; MBE/WBE reports at least quarterly; Financial Status reports at least annually; Property Profile Form for each site within 30 days of cooperative agreement award, updated at end of project or sooner if significant activity occurs. **Measures of Success:** Acceptance of reports by EPA. **Deliverables:** Periodic reports meet schedule outlined in Section 3.

C) Contractor Procurement: The selection and procurement of required contractors were carried out in accord with the City's procurement procedures and EPA requirements. GeoEngineers has been selected by the City to provide technical and contractual services to plan design and carry out assessment activities. GeoEngineers was selected consistent with 40 CFR Part 30 policies. **Milestones:** The selection process began upon notice of grant award and work will begin upon commitment of cleanup funds from EPA. **Measures of Success:** The City hired appropriate contractors through competitive procurement procedures to perform assessment activities. **Deliverables:** Selected contractors for assessment and clean-up planning.

D) Final Performance Report: A final performance report will be submitted to the EPA Project Officer within 90 calendar days after the expiration or termination of the award provided to the Project Officer electronically. The report shall contain the same information as in the Quarterly Progress Reports but include the entire project period, before and after photos of the assessment site. **Milestones:** The Final Performance Report will specifically address lessons learned by the City and its contractors in implementing the Brownfields assessment as well as successes achieved. **Measures of Success:** Report shows assessment is complete and meets any required Institutional, Land Use or Engineering Controls. Draft Final Cleanup Plan and alternatives for cleanup actions will be provided to EPA for review and approval. **Deliverable:** Final Performance Report March 2009.

Task 2 - PUBLIC INVOLVEMENT

The City and their contractors will perform **Public Involvement** to ensure that community concerns are considered in planning and execution, and the public is kept informed of project progress and results. EPA grant funds in the amount of **$7,400** are budgeted to perform the following sub-tasks:

A) Outreach & Public Involvement Plan: Using grantee funds, the City will complete a **site-specific Public Involvement Plan**; within 30 days of receipt of EPA and others comments on the draft plan and follow that Plan throughout the life of the grant. **Milestones:** submit to EPA for review within 30 days of grant award. As part of that Public involvement Plan, the City will establish an information repository convenient to the site, designates a spokesperson to deliver information to general public for review and comment, and does at least three fact sheets. **Measures of Success:** Plan implemented and Target groups are engaged in activities and project based learning opportunities. **Deliverables:** Draft Plan, and if EPA provides comments, a final Plan; 60 days from award of the CAG.

B) Project Updates and other Public Information: A "fact sheet" will be prepared and distributed to the affected community at the beginning of the project, during assessment, and when it is complete, announcements/articles, Newsletters/Web pages, attendance of city councils and community group-meetings, or other communications as needed. **Public Notice and Comment**: (approx. $3,000) After the Analysis of Brownfields Cleanup Alternatives (ABCA) is prepared, the City will publish Notice of availability of the draft Analysis of Brownfields Cleanup Alternatives including the proposed cleanup plan for a 30-day public comment period and prepare and distribute a plain language "fact sheet" flyer to the community and post onto partner websites, press releases, and presentation at open meetings of the City council. Purchasing Supplies: (approx. $250) Consist of printing, postage and materials. **Milestones:** Publish notice of draft ABCA by August 2008 for 30-day comment period, Meet with community groups during comment period, Distribute information, post to websites, publish in local news and/or business journal, Summarize and prepare response to comments by September 2008. **Measures of Success:** Fact sheets distributed widely, comments received from community groups, stakeholders, and interested parties at large. **Deliverables:** Copy of notices; articles, summary of any significant comments received and published in the local news/ Kitsap Business Journal, websites and news letters, summary of public comments and how they are addressed.

Task 3 - SITE CHARACTERIZATION

EPA grant funds of $**176,100** are budgeted to perform the following sub-tasks. As noted previously, additional funding is being sought to help facilitate a comprehensive characterization of this site.

A) Site Characterization – Phase 1 Assessment: site reconnaissance, historical review, etc. **Milestones:** Sites assessed with EPA cooperative agreement funds meet the "All Appropriate Inquiry" standards established in the Brownfields Law by completion of an ASTM Phase 1 Site Assessment. **Measures of Success:** An ASTM Standard E1527-05 Phase 1 ESA is completed. **Deliverable:** Phase 1 ESA is documented when and by whom, and a copy included in the cooperative agreement file.

B) Site Characterization – Phase 2 Assessment: The contractor will perform limited Phase 2 investigations. It is anticipated that the sampling effort will include subsurface soil and/or groundwater samples to be collected and submitted for analysis of petroleum hydrocarbons (gasoline/diesel/oil), VOCs, SVOCs (including PAHs), metals, PCBs, tributyl-tin and possibly other manufactured gas plant byproducts based on the likely use and possible release in the former operations on this site. These analyses and documents will be submitted to the DOE project manager through the VCP for concurrence that the plans can be expected to meet State requirements. **Milestones:** A limited Phase 2 assessment is submitted to DOE and EPA. **Measures of Success:** Work accepted by State and EPA. **Deliverables:** Document placed in the public record and City's grant files.

C) Quality Assurance & Health and Safety Plans: As part of the work to be done under the site characterization, a site specific Quality Assurance Project Plan (QAPP) will be prepared and submitted to EPA for review and approval before any sampling is done. The contractor will be tasked to prepare and submit to EPA an approvable site-specific Quality Assurance Plan (SQAP) for sampling during design. The QAPP will follow EPA QA R-5 guidance. The City will also task the contractor to prepare and follow an OSHA-compliant Health and Safety Plan (HSP), and will place a copy in the grant file. **Milestones:** Plan developed and submitted at least 4 weeks prior to the proposed date for collecting samples. **Measures of Success:** If comments are received, any necessary changes are made. The City tasks the contractor to prepare and follow QAPP, an OSHA-compliant Health and Safety Plan (HSP), and place a copy in the grant file. **Deliverables:** Quality Assurance Project Plan for EPA approval, (Sept 2007); Health and Safety Plan (to file), Laboratory Data Report that will be appended to the Final Cleanup Plan Report.

D) ESA and NHPA

1. ESA: Contractor will either update previous studies and reports to identify any threatened or endangered species or habitat at or in the vicinity of the site and contact the Washington Department of Fish and Wildlife (WDFW) and any Tribes with interest in the site. Alternatively, if sufficient studies have not been conducted, the City will work with the Suquamish and Skokomish Tribes to document all species or habitat that may be affected by this project. The City's environmental contractor will also be tasked to identify any threatened or endangered species or habitat at or in the vicinity of the site and contact the WDFW and Tribe with an interest in the sites. Along with that information the contractor will evaluate and report whether cleanup alternatives appear likely to disturb or harm any species or habitat and if so what mitigation could be done.

2. NHPA: Since the property site may be a potentially culturally sensitive area, a cultural resources overview will be completed by an Anthropological Archaeological Service, or at the request of the Suquamish and/or the Skokomish Tribes contacting the State Historic Preservation Officer to determine if any historic or cultural resources are present. This site has a low probability for significant hunter-fisher-gatherer or historic period archaeological resources due to previous disturbances in the project area. The public will also be notified and allowed a public comment period and to determine whether the site is

considered to be of concern by the State Historic Preservation Officer (SHPO), prior to implementation of assessment activities as required by state statute.

Milestones: Using this information, the contractor will evaluate and report whether assessment activities and clean-up alternatives appear likely to disturb or harm any species or resources and will contact EPA about the findings. **Measures of Success:** If impacts options evolve as to what mitigation could be done or, if none, acceptance of determination by SHPO, Tribe, WDFW, and EPA. **Deliverables:** Present to EPA in separate Letters (March 2007).

3.0 SCHEDULE AND DELIVERABLES

Key milestones, activities, and accomplishments over the length of the cooperative agreement.

DUE DATE	ITEM	EPA Project Officer	EPA Grants Officer	EPA Finance Officer
July 20, 2006	Application Package, including Cooperative Agreement Work Plan	X	X	
November 2006	Contractor Procurement complete	X		
December 2006	Public Involvement Plan	X		
December 2006	Fact sheet - project starting	X		
December 2006	Property Profile Form	X		
December 2006	Phase I ESA	X		
01/30/07	Quarterly Report 1	X		

1/30/07	MBE/WBE Report	X (copy)	X	
12/30/07	Interim Financial Status Report	X(copy)	X	
01/30/08	Quarterly Report 5	X		
01/30/08	MBE/WBE Report 5	X (copy)	X	
January 2008	Quality Assurance Project Plan (QAPP), Sampling and Analysis Plan (SAP) and Health and Safety Plan	X		
3/01/08	Phase 2 Environmental Assessment	X		
04/30/08	Quarterly Report 6	X		
04/30/08	MBE/WBE Report 6	X (copy)	X	
07/30/08	Quarterly Report 7	X		
07/30/08	MBE/WBE Report 7	X (copy)	X	
10/30/08	Quarterly Report 8	X		

10/30/08	MBE/WBE Report 8	X (copy)	X	
June 2008	Fact Sheet- Assessment results	X		
October 2008	Cleanup Alternatives (ABCA)	X		

WORK PLAN BUDGET

A. TABLE ***includes only those tasks & activities funded with EPA funds.***

1) Project management, 2) Public involvement, 3) Site investigation.

Budget Categories	Task 1 Project Management (reporting, coordination)	Task 2 Public Involvement (fact sheets, newsletters, meeting)	Task 3 Site Characterization, QAPP, ESA, Data analysis, Project Reports	TOTAL
1. Force Labor *-City-*	$12,500	$2,000	$1,500	$16,000
2. Supplies	$0	$250	$250	$500
3. Contractual (Contractors, subcontractors, consultants, engineering, analytical) – *GeoEngineers, Inc.*	$10,000	$5,400	$166,100	$181,500
4. Travel	$2,000	$0	$0	$2,000
5. Other	$0	$0	$0	$0
Total	$14,500	$7,650	$167,850	$200,000

B. Budget Narrative:

1) Force labor: Dan Miller, Public Works Project Manager – 152 hours @ $125/hr. = $19,000
Administrative or Staff Assistant – 22 hours @ $45/hr. = $1,000

2) Equipment: Includes field and general office materials, printing, postage, and materials.

3) Travel: Includes costs to attend public meetings, and Brownfields training 1 person per diem.

4) Contractual: The selected contractors and subcontractors will carry out the engineering, chemical analytical testing, planning and other functions to complete **Tasks 1 through 3** described below.

5) Consultants: The City will use their current consultants for varied tasks to complete some of the work described in **Tasks 1-4** below.

Task 1: PROJECT MANAGEMENT AND REPORTING

The City will perform project management including reporting and contractor procurement. EPA grant funds in the amount of **$16,500** are budgeted to perform Project Management. The City's recipient staff will prepare and submit project progress, financial and MBE/WBE reports.

Task 2: PUBLIC INVOLVEMENT

EPA grant funds in the amount of **$7,400** are budgeted for the City and their contractors or consultants to perform Public Involvement; fact sheets, news media, meetings w/stakeholders.

Task 3: SITE INVESTIGATION & ANALYSES

EPA grant funds of **$176,100** are budgeted to perform Site Characterization – Phase 1 and limited Phase 2 Assessments, develop Quality Assurance & Health and Safety Plans, ESA and NHPA, and develop reports to identify any threatened or endangered species or habitat.

ATTACHMENT A

ATTACHMENT B

ATTACHMENT C

ATTACHMENT D